

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

|                          |   |  |
|--------------------------|---|--|
| -----                    | X |  |
|                          | : |  |
| UNITED STATES OF AMERICA | : |  |
| - v. -                   | : | CONSENT PRELIMINARY ORDER<br>OF FORFEITURE/<br><u>MONEY JUDGMENT</u> |
| KONSTANTIN IGNATOV,      | : |  |
| Defendant.               | : | S9 17 Cr. 630 (ER)   |
|                          | : |  |
| -----                    | X |  |

WHEREAS, on or about October 4, 2019, KONSTANTIN IGNATOV (the “Defendant”), was charged in a four-count sealed Superseding Information, S9 17 Cr. 630 (ER) (the “Information”), with conspiracy to commit wire fraud, in violation of Title 18, United States Code, Section 1349 (Count One); wire fraud, in violation of Title 18, United States Code, Sections 1343 and 2 (Count Two); conspiracy to commit money laundering, in violation of Title 18, United States Code, Section 1956(h) (Count Three); and conspiracy to commit bank fraud, in violation of Title 18, United States Code, Section 1349 (Count Four);

WHEREAS, the Information included a forfeiture allegation as to Counts One, Two, and Four of the Information, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(A), and Title 28, United States Code, Section 2461(c), as a result of the commission of the offenses charged in Counts One, Two, and Four of the Information, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offenses charged in Counts One, Two, and Four of the Information;

WHEREAS, the Information also included a forfeiture allegation as to Count Three of the Information, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), of any and all property, real and personal, involved in the offense charged in

Count Three of the Information, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in the offense charged in Count Three of the Information;

WHEREAS, on or about October 4, 2019, the Defendant pled guilty to Counts One through Four of the Information, pursuant to a plea agreement with the Government, wherein the Defendant admitted the forfeiture allegations with respect to Counts One through Four of the Information, and agreed to forfeit: (i) pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(A), and Title 28, United States Code, Section 2461, any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses charged in Counts One, Two, and Four of the Information that the Defendant personally obtained; and (ii) pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in the offense charged in Count Three of the Information, and any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in the offense charged in Count Three of the Information;

WHEREAS, the Defendant consents to the entry of a money judgment in the amount of \$118,000 in United States currency representing the amount of proceeds traceable to the offenses charged in Counts One, Two and Four of the Information that the Defendant personally obtained and property involved in Count Three of the Information; and

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the Defendant, the proceeds traceable to the offenses charged in Counts One, Two and Four of the Information that the Defendant personally obtained and property involved in Count Three of the Information cannot be located upon the exercise of due diligence.

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Damian Williams, United States Attorney, Assistant United States Attorneys, Kevin Mead and Nicholas Folly of counsel, and the Defendant, and his counsel, Jeffrey ~~Lichtman~~, Esq., that: *Jeffrey Chebrowe* (25) 3/5/24

1. As a result of the offense charged in Counts One through Four of the Information, to which the Defendant pled guilty, a money judgment in the amount of \$118,000 in United States currency (the "Money Judgment"), representing the amount of proceeds traceable to the offenses charged in Counts One, Two and Four of the Information that the Defendant personally obtained and property involved in Count Three of the Information, shall be entered against the Defendant.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the Defendant, KONSTANTIN IGNATOV, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

3. All payments on the outstanding money judgment shall be made by postal money order, bank or certified check, made payable, in this instance, to the United States Department of Treasury, and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Illicit Finance and Money Laundering Unit, One St. Andrew's Plaza, New York, New York 10007 and shall indicate the Defendant's name and case number.

4. The United States Department of Treasury or its designee shall be authorized to deposit the payment on the Money Judgment into the Treasury Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. Pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.

6. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

7. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

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8. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

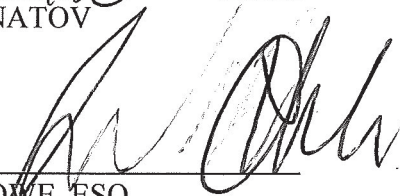
By: /s/ Kevin Mead  
KEVIN MEAD/NICHOLAS FOLLY  
Assistant United States Attorneys  
One St. Andrew's Plaza  
New York, NY 10007  
(212) 637-2211/2433

3/5/2024  
DATE

KONSTANTIN IGNATOV

By:   
KONSTANTIN IGNATOV

3/5/24  
DATE

By:   
JEFFREY CHABROWE, ESQ.  
Attorney for Defendant

3/5/24  
DATE

SO ORDERED:

  
HONORABLE EDGARDO RAMOS  
UNITED STATES DISTRICT JUDGE

3/5/2024  
DATE